

**PUBLIC UTILITIES COMMISSION**

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March 2, 2018

Ryan Stevenson  
Principal Advisor  
Regulatory Affairs  
Southern California Edison  
8631 Rush St, General Office 4 – 235E (2nd Floor)  
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RE: West of Devers Upgrade Project: Minor Project Refinement #8

Dear Mr. Stevenson,

On February 27, 2018, Southern California Edison (SCE) submitted Minor Project Refinement #8 request for a new splice location and a new pole location to the previously approved Telecom and Transmission Line components approved by the California Public Utilities Commission (CPUC) under Notice to Proceed No. 3, August 10, 2017 (Telecom) and Notice to Proceed No. 4, September 5, 2017 (Transmission) in support of the West of Devers Upgrade Project, in the City of Beaumont, Riverside County, California.

The CPUC voted on August 18, 2016 to approve SCE's West of Devers Upgrade Project (Decision D.16-08-017) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041).

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Plan (MMCRP) to ensure compliance with all mitigation measures imposed on the West of Devers Upgrade Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as final project design and engineering or need for addition workspace, are anticipated and common practice for construction efforts of this scale and that a Minor Project Refinement request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Refinement, and that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities.

Minor Project Refinements are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Refinements do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

Minor Project Refinement #8 for a new splice location and a new pole location to the previously approved Telecom and Transmission alignment, respectively, is granted by CPUC based on the factors described below.

**SCE Minor Project Refinement Request.** Excerpts from the SCE Revised Minor Project Refinement request, received February 27, 2018, are presented below (indented):

New Splice Location for NTP #3

One overhead fiber optic cable splice, on Pole 4140225E, on Pettit Street, in Moreno Valley is required for the Vista-Moreno tap to El Casco. The cable crew will drive to existing Pole 4140225E, park on along the paved street curb and walk along the shoulder of the road to access the existing splice box located on the pole. The work area will be approximately 40- feet in each direction from the pole parallel with the pole line, from the edge of pavement to approximately 10-feet past the pole line.

#### New Pole Installation for NTP #4

One 80-foot light weight steel pole will be installed west of the existing Valley - Mayberry - Moreno - Vista 115 kV-line line, between Towers M4-T3 and M4-T2. The existing wire between those two towers will be dead ended into the new steel pole to relocate the wire to a lower elevation, to maintain proper clearances between the 115-kV line and the new 220-kV lines that will be installed overhead. Existing conductor will be reused for this work, and new conductor will be spliced in, to maintain adequate tension between the new pole and the existing towers on each side.

#### **Biological Resources:**

##### New Splice Location for NTP #3

Prior to conducting a preconstruction survey (FRED number: 000022-R1), a desktop analysis of publicly available data and relevant project data was conducted to determine the potential for special-status species to occur. The conclusions of the desktop analysis were confirmed in the field during the preconstruction survey.

The pole and associated work area are located on the shoulder of an existing paved road adjacent to agricultural land regularly disked by the landowner. Adjacent land uses include residential and agricultural. Habitat suitability was determined as follows:

Burrowing Owl – Due to regular disturbances within the work area, burrowing owl burrows are not expected in the work area. However, burrowing owls often inhabit the margins along agricultural fields and development. Therefore, burrowing owls have the potential to occur near the work location. However, no burrowing owl or burrowing owl sign were observed within 500' of the work area. Additional nesting bird surveys, if needed, monitoring, and nest management, if needed, will be conducted according to the Nesting Bird Management Plan.

Special-status Plants – The work area does not include suitable habitat for special-status plants.

Regulated Trees – No trees are located in the work area.

Nesting Birds – Suitable substrates for nesting birds, including trees, shrubs, man-made structures, and the ground surface, are located in the vicinity of the work area. However, no active bird nests or breeding behaviors were observed.

Desert Tortoise – The work location is not located within the range of the species.

Listed Riparian Birds – The work area is not located within 500 feet of habitats for the listed riparian birds.

Stephens' Kangaroo Rat – The species is known to occur in suitable habitats in the Moreno Valley. Suitable habitats include grassland/forbland and scrub habitats on the margins of the grassland/forbland areas. Due to development of the roadway and regular disking of the agricultural land adjacent to the work area, however, kangaroo rats are not expected. No burrows or sign of SKR were observed.

Coastal California Gnatcatcher – The work area is not located within 500 feet of suitable habitat for the species.

Golden Eagle – Habitat marginally suitable for golden eagle nesting is located within 2 miles of the work location, to the northwest. However, no suitable nesting habitat is located within 1 mile of the work location. While golden eagles may forage in the vicinity of the work location, no impacts are anticipated.

Special-status Terrestrial Herpetofauna – Due to the level of disturbance, the work area does not include habitat supporting special-status herpetofauna.

Special-status Small Mammals – Due to the level of disturbance no special-status small mammals are expected to occur. Furthermore, due to the nature of the construction activities no impacts would be expected. No burrows or sign of small mammals were observed.

American Badger, Desert Kit Fox, Ringtail – No suitable habitat is present in the work area or vicinity.

Jurisdictional Waters - No impacts to jurisdictional waters are required.

#### New Pole Installation for NTP #4

A desktop analysis of publicly available data and relevant project data was conducted to determine the potential for special-status species to occur at the work location. Since included in early iterations of project design, this location was included in the study area for previous habitat assessments and focused/protocol surveys.

Burrowing Owl –Burrowing owls occur in a variety of habitats, but most typically sparsely vegetated grasslands and scrub habitats that are relatively flat and open, with adjacent forage land. The work location is situated within relatively dense coastal sage scrub and disturbed/developed land at the bottom of a slope within the San Timoteo Badlands. Due to lack of habitat suitability, no burrowing owls are expected. However, a preconstruction survey prior to construction will be conducted to rule out presence.

Special-status Plants – Because the structure is located adjacent to an existing road and a large portion of the work area is located on the road, impacts to native soils and vegetation that may support special-status plants will be limited. No special-status plants were observed during project surveys. Therefore, no impacts to special-status plants are anticipated.

Regulated Trees – No trees are located in the work area. Therefore, no permits are required for tree trimming or removal.

Nesting Birds – Suitable substrates for nesting birds, including trees, shrubs, man-made structures, and the ground surface, are located in the vicinity of the work area.

Desert Tortoise – The work location is not located within the range of the species. Therefore, no impacts are anticipated.

Listed Riparian Birds – The work area is not located within 500 feet of habitats for the listed riparian birds. Therefore, no impacts to listed riparian birds are anticipated.

Stephens' Kangaroo Rat – The work area is not located within 100 feet of suitable Stephens' kangaroo rat habitat. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher – The work area is situated within suitable habitat for the Coastal California Gnatcatcher. No gnatcatchers were detected during protocol surveys conducted in 2015, 2016, and 2017. In accordance with the Biological Opinion Conservation Measure 19, "a Qualified Biologist will conduct preconstruction clearance surveys within 10 days prior to the start of construction at Project sites during the defined breeding season." Gnatcatchers are not expected to occur at this location.

Golden Eagle – Habitat marginally suitable for golden eagle nesting is located within 2 miles of the work location. However, no golden eagle nests were identified within 2 miles of the work location during protocol aerial surveys conducted in 2016 and 2017. While golden eagles may forage in the vicinity of the work location, no impacts are anticipated.

Special-status Terrestrial Herpetofauna – The work area does not include habitat supporting special-status herpetofauna.

Special-status Small Mammals – Due to lack of habitat suitability, no special-status small mammals such as pocket mice are anticipated. However a preconstruction survey focusing on burrows and sign of special-status small mammals will be conducted prior to the start of construction.

American Badger, Desert Kit Fox, Ringtail – Due to range and habitat limitations, no kit fox or ringtail are anticipated. Badgers inhabit a variety of habitats. Due to the local topography and hydrology, it is unlikely that a badger would den in the vicinity of this work location. However, a preconstruction clearance survey will be conducted prior to the start of construction.

Jurisdictional Waters – A jurisdictional feature runs adjacent to the existing access road opposite the structure location. The feature is located within the work area; however, impacts (alteration and dredge/fill) activities will be avoided.

## **Cultural Resources:**

New Splice Location for NTP #3 - The new telecom splice site is located outside of any previous WOD cultural resources inventories and thus required cultural survey. An intensive pedestrian survey of the splice site footprint and the 30-m buffer, which constituted the Area of Potential Effect (APE) was conducted by PanGIS archaeologist Annemarie Cox on February 21, 2018. The record search and survey for the new splice site were negative for cultural resources. *Cultural Resources Survey of a Splice Site on the Vista-Moreno Fiber-Optic Cable for Southern California Edison (SCE) Company's West of Devers (WOD) Project, Morena Valley, Riverside County, California. 2016. Cox*

New Pole Installation for NTP #4 - The new pole installation and associated work areas in Segment 2 are located within the WOD APE and were covered within the record search data that was conducted during previous WOD surveys and studies. The record search and survey for the new pole site were negative for cultural resources. *Cultural Resources Management Plan for Southern California Edison Company's West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties, California. 2016. Rosemead, CA: Southern California Edison.*

## **CPUC Evaluation of Minor Project Refinement Request**

In accordance with the MMCRP, the subject Minor Project Refinement request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities and that the subject request was within the geographic boundary of the Project study area. The following discussion summarizes this analysis for agriculture, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use, noise, paleontological resources, traffic and transportation, visual resources, water resources, and wildland fire. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures (MMs) and Applicant Proposed Measures (APMs), and are based on specific site conditions and/or are proposed conditions by SCE.

**Agricultural:** No Important Farmland will be impacted with the implementation of this MPR #8.

**Air Quality:** During proposed construction, SCE shall implement the Fugitive Dust Control Plan approved by the CPUC on May 22, 2017, as well as the Exhaust Emissions Control Plan approved by CPUC on June 8, 2016. In addition, in compliance with MM AQ-1b, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards. No additional impacts to air quality will occur with the implementation of MPR #8.

**Biological Resources:** The splice location described in MPR #8 is located on the shoulder of an existing paved road adjacent to agricultural land regularly disked by the landowner.

The new pole location is situated within relatively dense coastal sage scrub and disturbed/developed land at the bottom of a slope within the San Timoteo badlands. No impacts to regulated trees are anticipated at this time. If tree removal or trimming are required, the contractor will be responsible for obtaining permits, if needed, from the local jurisdiction. The new pole location is located within suitable habitat for the Coastal California gnatcatcher. No gnatcatchers were detected during protocol surveys conducted in 2015, 2016, and 2017. In accordance with the Biological Opinion Conservation Measure 19, "a qualified biologist will conduct preconstruction clearance surveys within 10 days prior to the start of construction at project sites during the defined breeding season." Gnatcatchers are not expected to occur at this location. This portion of the alignment includes habitats for nesting birds (e.g., trees, shrubs, the ground surface, man-made structures). If work extends into the nesting bird season, SCE will conduct additional focused nest location surveys in accordance with the Nesting Bird Management Plan. Also, as required by MM WIL-1a, preconstruction

surveys for wildlife will be conducted 10 days prior to construction. Additionally, preconstruction survey “sweeps” will also be conducted immediately prior to construction. No additional impacts to biological resources will occur with the implementation of MPR #8.

**Cultural Resources:** The new telecom splice site is located outside of any previous WOD cultural resources inventories and thus required cultural survey. An intensive pedestrian survey of the splice site footprint and the 30-m buffer, which constituted the APE was conducted by PanGIS archaeologist Annemarie Cox on February 21, 2018. The record search and survey for the new splice site were negative for cultural resources.

The new pole installation and associated work areas in Segment 2 are located within the WOD APE and were covered within the record search data that was conducted during previous WOD surveys and studies. The record search and survey for the new pole site were negative for cultural resources. No additional impacts to cultural resources will occur with the implementation of MPR #8.

**Geology and Soils:** SCE conducted geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics as outlined in MMs G-1a, G-2a, and G-5a. The geotechnical survey reports were reviewed and approved by the CPUC on August 17, 2017. No additional impacts to geology and soils will occur with the implementation of MPR #8.

**Hazards and Hazardous Materials:** As required by MM HH-1a, SCE prepared and submitted a Hazardous Materials and Waste Management Plan to the CPUC on September 27, 2017. Hazardous materials used and stored on site for the duration of construction activities and will be managed according to the Plan. A Soil Management Plan has been developed consistent with MM HH-2a and HH-3a to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities, including soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. SCE’s Soil Management Plan was combined with the Hazardous Materials and Waste Management Plan described above. Also, SCE’s contractor submitted information including written procedures for fueling and maintenance of construction equipment and an Emergency Response Plan. No additional impacts from hazards or hazardous materials will occur with the implementation of MPR #8.

**Land Use:** As required by MM LU-1a, a Construction Notification Plan was prepared by SCE and approved by CPUC on May 22, 2017. The Plan identified the procedures to ensure that SCE will inform property and business owners of the location and duration of construction. The Plan includes provisions for public noticing including mailers, newspaper advertisements, public venue notices, and includes the establishment of a public liaison and toll-free information hotline. No additional impacts to land use will occur with the implementation of MPR #8.

**Noise:** Best Management Practices for construction noise management will be implemented as outlined in MM N-1a to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction. Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with local jurisdiction. Construction traffic and helicopter flights shall be routed away from residences and schools, where feasible. No additional impacts to noise will occur with the implementation of MPR #8.

**Paleontological Resources:** A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers Upgrade Project and was approved by the CPUC on May 9, 2017. Monitoring for paleontological resources will be conducted in compliance with MM PAL-1d and the PRMMP requirements. No additional impacts to paleontological resources will occur with implementation of MPR #8.

**Traffic and Transportation:** Consistent with MM T-1a and MM T-1b, Construction Transportation and Traffic Control Plans have been developed and approved. The Construction Transportation Plan describes timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. No additional impacts to traffic and transportation will occur with the implementation of MPR #8.

**Visual Resources:** The splicing activities described in this Minor Project Refinement #8 are no different than what was described in NTP #3 and are temporary. The new 80-foot light weight steel pole will be installed west of the existing Valley - Mayberry - Moreno - Vista 115 kV-line line, between Towers M4-T3 and M4-T2. No additional impacts to visual resources will occur with the implementation of MPR #8.

**Water Resources:** As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM. The Erosion Control Plan was incorporated into the Stormwater Pollution Prevention Plan, which will be kept onsite and readily available on request. SCE submitted the Stormwater Pollution Prevention Plans to the CPUC on May 25, 2017. Any changes included in this MPR will be incorporated into the SWPPP document. No additional impacts to water resources will occur with the implementation of MPR #8.

**Wildland Fire:** SCE submitted a Fire Management Plan on February 10, 2017 to satisfy the conditions of MM WF-1a and the Plan was approved by the CPUC on July 18, 2017. This Fire Management Plan has been submitted to local fire departments. No additional impacts to wildland fire will occur with the implementation of MPR #8.

**The conditions noted below shall be met by SCE and its contractors:**

- All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this Minor Project Refinement shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC EM upon request.
- SCE shall provide CPUC with the revised GIS data, which includes the project changes in this MPR #8.
- All crew members shall be WEAP trained prior to working on the Project. A log shall be maintained on-site with the names of all crew personnel trained. The WEAP training brochure can be provided in Spanish or other languages if appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Minor Project Refinement request shall be submitted for CPUC review.

Sincerely,



Billie Blanchard  
CPUC Environmental Project Manager

cc: V. Strong, Aspen